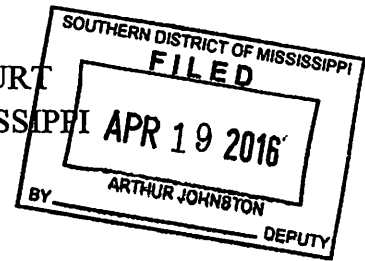


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:16cr28 DCB-LRA*

LANCE SCOTT

18 U.S.C. § 1341

18 U.S.C. § 513(a)

The Grand Jury charges:

At all times relevant to this indictment:

1. The bail bonding business involved the writing of surety insurance, which is a type of insurance that guarantees the execution of bonds and contracts of suretyship. A bail bond is a written obligation on the part of a person charged with a crime to pay a penal sum for failure to adhere to the terms of that written obligation, including appearing at court proceedings. A person or entity that is compensated for insuring the fulfillment of the obligations under a bail bond is known as a surety insurer.

2. In addition to needing a surety agent license in Mississippi, a bail bondsman must obtain an appointment and a general “power of attorney” (“POA”) from a surety insurer in order to conduct business on behalf of that surety insurer.

3. From December 2012, through at least August 2015, **LANCE SCOTT** was issued license number 10266153 by the Mississippi Department of Insurance and was the

owner of A Capital Bail Bonds, Inc. ("ACBB"), a company engaged in the bail bonding business using its office located in Brandon, Mississippi.

4. As a professional bail agent, **LANCE SCOTT** and his company ACBB wrote bonds and processed bond payments on behalf of American Surety Company, doing business using its offices at 250 East 96th Street, Suite 202 Indianapolis, Indiana 46240.

5. **LANCE SCOTT** secured the release of arrested individuals who were charged with a crime in the state Circuit and County Courts of Hinds County Mississippi, and elsewhere. In return for assuming the risk of an arrestee's future appearance in court, **LANCE SCOTT** collected a fee or premium that usually represented a percentage of the bail amount set by the court. A percentage of each premium collected by ACBB was then forwarded to American Surety Company in accordance with the terms of their agreement.

COUNT 1

Beginning in or about October 2014, and continuing through May 2015, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **LANCE SCOTT**, devised and intended to devise a scheme and artifice to defraud American Surety Company, Hinds County Circuit Clerk, and individuals seeking a surety bond, and did knowingly use and cause to be used the U.S. Mails for the purpose of executing the scheme and attempting to do so.

To accomplish its fraudulent purposes, the defendant, **LANCE SCOTT**, engaged in and caused various acts and transactions using his bail bonding business which were designed to and which enabled defendant to attempt to obtain money from individuals seeking a surety bond.

It was a part of the scheme and artifice to defraud that the defendant would create counterfeit POA documents with the intent to deceive both inmates released on bond from the Hinds County Detention Center, and the Hinds County Circuit Clerk. **LANCE SCOTT** collected premiums on approximately \$1,085,000 in fraudulent bonds and failed to notify or send any portion of the premium to American Surety Company.

It was further a part of the scheme and artifice to defraud that the defendant enriched himself with the premium payments from individuals released from jail on the counterfeit bonds.

It was further apart of the conspiracy that **LANCE SCOTT** would utilize POA numbers for the counterfeit bonds, and some of the numbers were secured by an American Surety Company agent in California.

From in or about October 2014, through in or about May 2015, in Hinds County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **LANCE SCOTT**, with the intent to defraud, devised the above-described scheme and artifice to defraud and obtain money by materially false and fraudulent pretenses, representations, and promises.

On or about July 22, 2015, in Hinds County in the Northern Division of the Southern District of Mississippi, for the purposes of executing or attempting to execute the above-described scheme and artifice to defraud and deprive, Defendant **SCOTT** knowingly caused to be delivered by mail according to the direction thereon, from Jackson, Mississippi to Indianapolis, Indiana, a letter containing certain documents, including a Judgment Nisi date-stamped as filed July 9, 2015, by the Circuit Clerk of Hinds County.

All in violation of Section 1341, Title 18, United States Code.

COUNT 2

On or about October 28, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make, utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, A.A.

In violation of Section 513(a), Title 18, United States Code.

COUNT 3

On or about November 21, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make, utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, E.B.

In violation of Section 513(a), Title 18, United States Code.

COUNT 4

On or about November 24, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make, utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, K.G.

In violation of Section 513(a), Title 18, United States Code.

COUNT 5

On or about December 11, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make, utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, A.T.

In violation of Section 513(a), Title 18, United States Code.

COUNT 6

On or about December 22, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make, utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, H.M.

In violation of Section 513(a), Title 18, United States Code.

COUNT 7

On or about January 4, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make, utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, T.P.

In violation of Section 513(a), Title 18, United States Code.

COUNT 8

On or about January 8, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make, utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, J.G.

In violation of Section 513(a), Title 18, United States Code.

COUNT 9

On or about February 20, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make,

utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, I.L.

In violation of Section 513(a), Title 18, United States Code.

COUNT 10

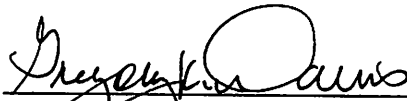
On or about February 23, 2015, in Hinds County, in the Northern Division of the Southern District of Mississippi, the defendant, **LANCE SCOTT**, did knowingly make, utter, possess, or otherwise transfer, a counterfeited security of American Surety Company, a bail bond, with the intent to deceive American Surety Company and another person, C.W.

In violation of Section 513(a), Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Sections 981(a)(1)(C), Title 18, United States Code, and Section 2461,
Title 28, United States Code.



GREGORY K. DAVIS
United States Attorney

A TRUE BILL:

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of
the grand jury on this the 19th day of April, 2016.



UNITED STATES MAGISTRATE JUDGE